

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION



In re: ) Chapter 9  
CITY OF DETROIT ) Case No. 13-53846  
Debtor. ) Hon. Judge Thomas J. Tucker

**EX-PARTE MOTION OF MARVIN SEALES FOR LEAVE TO FILE  
RESPONSE TO CITY OF DETROIT'S OBJECTION TO  
CLAIM NUMBER 3631 IN THE TRADITIONAL MANNER**

NOW COMES MARVIN SEALES, by and through his undersigned counsel, and for his *Ex-Parte* Motion for Leave to File Response to City of Detroit's Objection to Claim Number 3631 in the Traditional Manner respectfully states as follows:

1. Marvin Seales filed a Proof of Claim in this action, which has been designated Claim Number 3631.
2. City of Detroit filed its objection to claim number 3631 on November 4, 2019, seeking entry of an order disallowing and expunging Claim No. 3631.
3. Counsel for Mr. Seales understands that represented parties are to electronically file a response to the City's Objection; however, undersigned counsel for Mr. Seales does not have an ECF login and/or password for the United States Bankruptcy Court for the Eastern District of Michigan.

4. According to the Court's website, the next registration class for ECF filing for attorneys is December 12, 2019.

5. Mr. Seales opposes the Objection filed by the City, and his Response to the City's Objection must be filed by December 11, 2019.

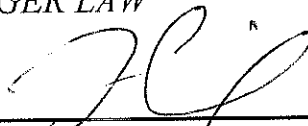
6. Therefore, Mr. Seales respectfully requests that this Court grant him permission to file his response to the City's Objection in the traditional manner.

7. Mr. Seales is filing said Response contemporaneously with this Motion, and a Proposed Order.

WHEREFORE, MARVIN SEALES respectfully requests that the Court GRANT his Motion for Leave to File Response to Debtor's Objection in the Traditional Manner.

Respectfully submitted,

*FIEGER LAW*



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GEOFFREY N. FIEGER (P30441)

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Dated: December 2, 2019

## CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2019, I filed the foregoing with the Clerk of the Court in the traditional manner and by US Mail to:

Marc N. Swanson, Esq.  
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James S. Craig